

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| | | |
|------------------|---|----------------------|
| In Re: | : | Chapter 13 |
| | : | |
| PAUL MACKENZIE | : | 3/31/2020 11:00 A.M. |
| MONICA MACKENZIE | : | Courtroom # 4 |
| | : | |
| | : | Case No. 19-17027 |

ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY

1. Admitted.
2. Admitted
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. Denied. The Debtors' Chapter 13 Plan addresses Movant's claim in § 4(f), wherein the Debtors' are attempting to modify their mortgage loan with Movant. However, the plan and debtors' schedules do incorrectly identify Movant as "Fay Financial" based on the information received from the Debtors' credit report.

12. Denied. Debtors deny that they have failed to make the stated payments as listed and avers that Movant is holding payment(s) in abeyance without crediting their account. However, if debtors have missed any payments, they wish to enter into a stipulation allowing them to repay any post-petition arrearages through the remainder of their Chapter 13 plan.
13. Denied.

WHEREFORE, it is requested that this Honorable Court DENY and DISMISS movant's Motion for Relief from the Automatic Stay, or in the alternative approve a stipulation permitting the Debtors to become current on any missed post-petition payments.

Respectfully Submitted,

YOUNG, MARR & ASSOCIATES

By: /s/Paul H. Young
Paul H. Young, Esquire
Attorney for Debtors
3554 Hulmeville Road, Suite 102
Bensalem, PA 19020
P: 215-639-5297
F: 215-639-1344
support@ymalaw.com